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Attorneys for Plaintiffs

THOMAS WILLIAMS

AND CARLOS WILLIAMS

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

THOMAS WILLIAMS,  
Plaintiff,

Case No. 2:20-cv-00598-TLN-KJN  
Case No. 2:19-cv-02345-TLN-KJN

v.

**JOINT STIPULATION AND ORDER TO  
CONTINUE PRE-TRIAL DEADLINES**

COUNTY OF SACRAMENTO; CITY OF  
RANCHO CORDOVA; NATHAN  
DANIEL; JOSEPH ZALEC; DEREK  
HUTCHINS and DOES 1 through 50  
inclusive,  
Defendants.

\_\_\_\_\_  
CARLOS WILLIAMS  
Plaintiff

v.

COUNTY OF SACRAMENTO;  
RANCHO CORDOVA POLICE DEPARTMENT;  
and DOES 1 through 50 inclusive,  
Defendants.

\_\_\_\_\_  
Plaintiffs THOMAS WILLIAMS and CARLOS WILLIAMS (“Plaintiffs”) and Defendants  
COUNTY OF SACRAMENTO, CITY OF RANCHO CORDOVA, NATHAN DANIEL, JOSEPH  
ZALEC, AND DEREK HUTCHINS, (collectively “Defendants”), by and through their (“Parties”)  
counsel of record, hereby stipulate and request that the Court continue the discovery deadline for 30 days  
for the limited purpose of completing the defendant deputies’ depositions and 90 days for the limited  
purpose of facilitating the production of records pursuant to the Court’s January 6, 2023 Order [Dkt. Nos.

43 & 48]. The Parties further request the extension of the other pre-trial deadlines in this matter. Good cause exists for the requested continuance pursuant to Federal Rules of Civil Procedure Rule 16(d) based upon the following:

1. On July 15, 2021, this Court consolidated the above-referenced cases with respect to discovery only.

2. On October 5, 2021, in Case No. 2:20-cv-00598-TLN-KJN, this Court issued an Amended Pre-Trial Scheduling Order setting forth all pre-trial deadlines. The Court entered the same Order on October 26, 2021 in Case No. 2:19-cv-02345-TLN-KJN.

3. On April 6, 2022, this Court granted the Parties' joint stipulation to extend the pre-trial deadlines, which extended the fact discovery deadline to January 12, 2023.

4. On January 4, 5, and 6, 2023, Plaintiffs began deposing Deputies Daniel, Zalec, and Hutchins. Those depositions, however, did not conclude. The Parties agreed to continue the Deputies' depositions until the end of January. The Parties request a 30-day extension of the discovery deadline for the limited purpose of completing the Deputies' depositions.

5. Furthermore, on January 6, 2023, Magistrate Kendall Newman granted in part Defendant City of Rancho Cordova's Motion to Compel and ordered Plaintiffs to produce additional financial records within 30 days. [Dkt. Nos. 43 in 2:19-cv-02345-TLN-KJN and 48 in 2:20-cv-00598-TLN-KJN].

6. The Parties also seek an extension of the pre-trial deadlines of 90 days for the limited purpose of facilitating the production of documents consistent with Judge Newman's order and for the Parties to resolve any disputes related to said production.

7. Because the Parties anticipate sending the financial records and deposition transcripts to experts in this matter, the Parties request that expert disclosure dates and dispositive motions also be extended.

8. The Parties also agree to extend discovery for the limited purpose of having Plaintiffs' expert examine the physical camera that was in Deputy Daniel's vehicle on the night of the incident and subsequently removed. The Parties request a 90-day extension of the discovery deadline for the limited purpose of arranging for Plaintiffs' expert to examine the physical camera at Defense Counsel's office.

9. The Parties, through their respective undersigned counsel, agree and hereby do stipulate to

respectfully request that the Court modify the scheduling order as follows:

Event	Schedule	Proposed New Schedule
Fact Discovery	January 12, 2023	To complete the Deputies' depositions: February 13, 2023  To facilitate production pursuant to Judge Newman's January 6, 2023 Order and Plaintiffs' inspection of camera: April 12, 2023
Expert Witness Disclosure	March 14, 2023	June 12, 2023
Supplemental Expert Witness Disclosure	Within 20 days after designation of expert witnesses	Remains unchanged
Dispositive Motions	August 15, 2023	November 13, 2023

Dated: January 19, 2023

BOHM LAW GROUP, INC.

By: /s/ Kelsey K. Ciarimboli (auth. 1/18/23)

Lawrence A. Bohm  
Kelsey K. Ciarimboli  
Daniel T. Newman  
Attorney for Plaintiffs

Dated: January 19, 2023

LONGYEAR & LAVRA, LLP

By: /s/ Nicole M. Cahill (auth. 1/18/23)

Van Longyear  
Nicole M. Cahill  
Attorney for Defendant  
COUNTY OF SACRAMENTO

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Dated: January 19, 2023

PORTER SCOTT  
A PROFESSIONAL CORPORATION

By: /s/ Jennifer L. Thompson

John R. Whitefleet

Jennifer L. Thompson

Attorney for Defendants

CITY OF RANCHO CORDOVA,

NATHAN DANIEL, JOSEPH ZALEC,

AND DEREK HUTCHINS

**ORDER**

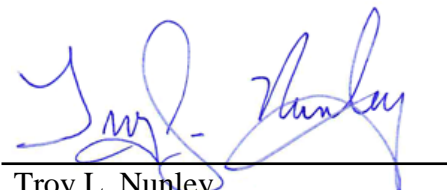
Good cause having been shown, based on the foregoing Stipulation by the Parties, the Court hereby  
ORDERS as follows:

1. The pre-trial deadlines in this case shall be amended as follows:

Event	Schedule	Proposed New Schedule
Fact Discovery	January 12, 2023	To complete the Deputies' depositions: February 13, 2023  To facilitate production pursuant to Judge Newman's January 6, 2023 Order and Plaintiff's inspection of camera: April 12, 2023
Expert Witness Disclosure	March 14, 2023	June 12, 2023
Supplemental Expert Witness Disclosure	Within 20 days after designation of expert witnesses	Remains unchanged
Dispositive Motions	August 15, 2023	November 13, 2023

**IT IS SO ORDERED.**

Dated: January 19, 2023

  
Troy L. Nunley  
United States District Judge